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Standardized Drivers' Licensing Policy-- Yes or No?

Lieutenant Colonel
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U.S. Army

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ABSTRACT

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Today, in our military services, we have very similar circumstances. Driving standards are up to each individual service and furthermore delegated down to the military member's battalion/squadron commander. Today, like our civilian trucking industry, we, the DoD industry, cannot afford to take unnecessary chances on our Federal highways as our humanitarian and CONUS base missions expand.

This paper is designed to provide the reader with an insight into the Commercial Motor Vehicle Safety Act of 1986 and its impact on our nation's highways. It will also take a critical look at the Federal waiver that the DoD requested and received, exempting all military members from the most important element of this Congressionally mandated bill, the standardized testing and licensing procedure called the Commercial Drivers License(CDL).

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**STANDARDIZED DRIVER'S LICENSING
POLICY
YES OR NO?**

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Standardized Drivers' Licensing Policy --

Yes or No?

by

LTC Robert Kubiszewski, USA

INTRODUCTION

A number of years ago while I was conducting a study on the transporter for the PATRIOT missile system, a two star general informed this young officer, "not to worry about a training plan for the driver." When I asked him why, his comeback was, "anyone who can scramble eggs, can drive a truck. Besides, our kids are smart, they've been driving a car since most were 16 years old." Well, it wasn't long after that while assigned to a truck battalion in the Federal Republic of Germany (FRG), when I saw an Army POL tanker off the autobahn in flames with an automobile underneath. This "scramble eggs syndrome" left a lasting impression with me. It is for this reason that I wanted to review the Commercial Driver's License (CDL) initiative by the Federal government and see how we, as a military, compare to the federal guidelines in driver training, testing and licensing.

In 1986, Congress passed the Commercial Motor Vehicle Safety Act (CMVSA), which created the requirement for all states to standardize licensing of commercial heavy truck drivers using a Commercial Drivers License (CDL). Various segments of industry protested, and DOD requested and was granted a waiver from the Federal requirement for military operators of government vehicles. This waiver was based on the understanding that each of the military services' drivers licensing standards would meet or exceed the federal standards; but do they? Are each of the

military services complying with the CMVSA waiver assumption? Presently, there are over one million drivers of military vehicles who were trained and licensed using military procedures. Were they adequate?

This paper will discuss what the Commercial Drivers License(CDL) is, why it was implemented, and its impact on the American trucking industry and on the safety of our Federal highways. It will also review how each of the services are currently conducting their driver training and testing programs, compare their standards to the trucking industry, draw conclusions regarding the level of their standards to the intent of the law, and recommend any changes to maximize the services' ability to provide transportation service safely on the Federal highways.

WHAT IS A COMMERCIAL DRIVERS LICENSE (CDL)?

The Commercial Drivers License(CDL) is a Federally mandated program to improve highway safety by ensuring that each driver of a commercial motor vehicle has only one commercial driver's license and is qualified to operate the vehicle. Unlike most other Federal safety requirements, the CDL requirements cover intrastate as well as interstate operations. (7) The Federal Highway Administration (FHWA) has developed standards that the states must use to test, license, and disqualify commercial motor vehicle drivers which include:

- requiring a driver to have no more than one license, no longer allowing the driver to hold multiple licenses;
- requiring each driver to pass a knowledge test and a driving skills test in a vehicle representative of the type the person intends to operate;

- requiring states to use the Commercial Driver's Licenses Information System, a computer based system that contains information about the holders' CDLs;

- and establishing minimum disqualification provisions.

Under the CDL, by April 1, 1992, drivers of vehicles over 26,000 pounds, transporting more than 15 persons or hauling specific amounts of hazardous cargo will have to pass CDL tests. Drivers who can verify at least two years of safe operation on the class of vehicle on which they want to be licensed only have to pass knowledge tests. After April 1, 1992, all drivers are required to take written and performance tests. Intrastate and interstate drivers are subject to the testing and licensing standards established under the CDL program. Anyone who operates a commercial motor vehicle under the above parameters must now possess a CDL issued by his or her home state. According to the FHWA, every state is now in compliance with the act as of October 1992.(14)

Finally, the Commercial Driver's License is not a Federal license. States will continue to be responsible for the issuing of all driver's licenses. Each state will continue to oversee and administer all of its testing and licensing procedures. Fees for licensing and testing will also be the direct responsibility of the state. During my interview with Mr. Samuel Rea from the Federal Highway Administration (FHWA), "it is not the government's intent to take over direct responsibility. We only want to laydown the ground rules so everyone is playing by the same rules."(8)

WHY WAS CDL IMPLEMENTED?

One needs to look at the size, the complexity and the problems of the trucking industry to understand the need. More than 5.5 million people drive medium and heavy trucks and buses. The industry comprises more than 260,000 American firms and accounts for 77 percent of all freight transportation revenues in this country.(11) The trucking industry employs 7.4 million Americans and generates annual revenues in excess of \$278 billion dollars.(12)

Industry Structure - The trucking industry is separated into two very basic segments, "for-hire" and "private" trucking. "For-hire" trucking involves the transportation of freight owned by someone other than the owner of the vehicle. Private trucking, on the other hand, occurs when a firm uses its own trucks to transport its own freight. Additionally, trucking policy is established within the framework of local, state, and federal regulatory bodies. (7)

	<u>FOR -HIRE</u>	<u>PRIVATE</u>
Truck Revenues	57%	43%
Goods Transported (by truck)	55%	45%

- 80% of for-hire trucks travel over 30,000 miles annually.
- 85% of private trucks travel less than 20,000 miles annually.

Table 1

Within these two basic segments, over 50% (Table 1) of the motor carriers in this country operate less than six vehicles and do not consider themselves as part of the trucking industry. Their primary business is that of manufacturing, construction, or of providing a service--not driving. The operation of trucks is only a small part of their business; hence, driving is only a means to their end. This diversity makes it difficult to keep the industry informed about safety laws and regulations and about the knowledge, skills, and attitudes that are so important to truck safety. To overcome these difficulties, Congress felt that strong Federal leadership must be involved to improve compliance with regulations, shape the skill, knowledge, and attitudes of drivers, and assure that vehicles are built and maintained for maximum safety. (13) Prior to the enactment of CDL, states had this responsibility.

Deregulation - a double edge sword - In 1981, deregulation of the trucking industry was accelerated by the Reagan administration. As a result, this industry experienced enormous growth during the 1980's. The flip-side to this growth was an initial sharp increase in highway fatalities which began to taper off in the late 80's and early 90's. The safety and compliance record of the commercial motor carrier industry (Table 2) was an additional cause for concern by Congress. A quick glance at the trucking fatalities will show you why this concern manifested into action. (13) Additionally, according to the FHWA, it is estimated that this industry is involved in over 500,000 accidents that result in over 160,000 injuries each year (medium and heavy-weight vehicles weighing 10,000 pounds or more). (7)

Table 2. Truck and Bus Fatality Statistics

(These deaths result from accidents involving medium and heavy weight vehicles weighing 10,000 pounds or more)

Year	1982	1983	1984	1985	1986	1987	1988
Trucks 10,000 lbs. or greater	5,229	5,491	5,640	5,734	5,579	5,591	5,501
Buses	206	216	211	211	197	219	220
Total	5,435	5,707	5,851	5,945	5,776	5,810	5,721

There are many factors that might explain these high numbers of accidents; however, most accidents fall back upon driver error. It becomes especially critical to the general public as the size, weight, and content (HAZMAT, passengers) of these loads become larger. Due to the added danger and greater driver training requirements for critical size loads, Congress limited CDL's policy to larger vehicles. Presently, the CDL threshold is only for vehicles that are greater than 26,000 pounds.

The Driver's License Shuffle - Licensing responsibilities in the past were handled at the state level. Regardless of your segment of industry, a truck driver of an 18-wheeler (private or for-hire) licensed in Ohio would be able to drive throughout the continental U.S. Additionally, this same driver, if suspended for a motor violation in Ohio, would be allowed to apply for a license in Indiana.(10) A normal practice by many truck drivers was to own multiple licenses. To compound the safety problem, no common standard was applied for testing and licensing these drivers among the states.

"Driver, driver everywhere and not a standard to be found", was the battle cry of the Congress when they tried to put their finger on this problem. Very simply, Congress felt that some standardized control needed to exist. Multiple licenses by drivers was the norm. If a driver lost his license in one state, he need only go to the next state and apply. Within hours, a bad driver could be back on the interstate driving badly again.

Senator Danforth, chairman of the Subcommittee on Surface Transportation, during the September 1989 hearings, gave an account that was astounding when you consider the great responsibility of a truck driver. He stated, "as you know, we provided for uniform licensing of drivers and tests for drivers who apply for licenses; because in the past it was possible in - I can't remember - in 20 States or so, to be licensed to drive a truck because you could show up in your passenger car with automatic transmission and drive around in it. So our idea was that people who were going to be professional drivers should know how to drive a truck". (13) The current system was not making drivers accountable. The Commercial Motor Vehicle Safety Act of 1986 and its establishment of the CDL was their answer.

WHAT IS THE IMPACT ON INDUSTRY?

Congress likes it. The Department of Transportation believes it will significantly improve the safety of our nation's highways. The American Trucking Association (ATA) believes it has some excellent attributes. Even the U.S. Army is charging off to adopt the concept and transition soldiers' licenses to the civilian equivalent. But is CDL a good idea? There are three critical areas that industry is presently dealing with as a result of CDL, driver shortages, training requirements, and safety.

Driver shortages - "On April of 1992, commercial truck drivers (an estimated 2.5 million of them) were required to have the CDL. As of this date, according to an article in S&P Credit Week in late April, nearly one quarter of a million drivers had not or were unable to qualify. Industry experts believe this added requirement will add to the existing truck driver shortage. This shortage is viewed by many as being the biggest challenge the industry will face these next ten years." (Railway Age, Why Truckers Face a "tough haul" pp. 15, June 1992)

The American Trucking Association echoes a similar concern. "It is not because of anything the trucking business has done. The U.S. will witness a decrease of the three percent annual growth in the workforce to less than one percent. So trucking will have to look every place it can for new drivers. Secondly, new safety legislation, such as added training requirements under CDL, will put a measurable group of people off the road."

I believe that even a bigger problem may exist once the North American Free Trade Agreement (NAFTA) goes into affect. According to industry predictions, carrier market shares can triple within 5-6 years after the agreement is signed. This massive expansion coupled with up to a 150% annual turnover rate by long haul drivers could seriously jeopardize this industry's growth. Where is the system going to get the drivers?

Training requirement - During the Motor Carrier Hearings on the Hill in April 1989, Mr. R.V. Durham, Vice President, Director, Safety and Health Department, International Brotherhood of Teamsters, stated several concerns over the CDL procedure. One of his key concerns was over the content of the knowledge test for the CDL. He believed that a 35% failure rate was entirely

too high. Although he is in full support of the common license for testing the skills and knowledge of those who drive heavy trucks, buses and hazardous materials, his concern was over those drivers who are not trained in taking written tests. He believed there should be a provision for drivers who have proven, over hundreds of thousands of miles that they are good, safe drivers. Some form of correlation should exist for these folks. (13)

The Transportation Lawyers Association (TLA), whose practice involves representing various major transportation agencies, expressed concern about the lack of Federal involvement in providing truck training guidelines. According to their chairman, William P. Jackson, "one of the effects of lessening economic deregulation has been an increased concern by us and the public that highway safety has suffered. I strongly suggest that Congress adopt specific training guidelines for operator commercial motor vehicles".

The Teamsters also believe that testing is only one side of this equation. What about the most important aspect - training? What training is available to help drivers prepare for these kinds of tests. They strongly feel that standardized training goes hand-in-glove in assisting truck drivers to successfully pass the CDL. Their recommendation is that Congress should establish a grant program to provide driver training.

This concern for driver training was further voiced by the American Trucking Association. Research has shown that focused, specific classroom and over-the-road training can increase a heavy truck driver's skill and his or her awareness of the appropriate speeds for different roadway conditions. Surveys indicate, however, that many heavy truck drivers never receive any formal training. The Federal CDL test requirement for the Commercial Vehicle Driver's License, even though it includes a road test, does not appear to be an adequate substitute for a training requirement. Unfortunately, the

schools offering the services to train drivers do not fall under any Federal agency supervision. The result is a spectrum of training courses ranging from excellent to terrible. (10)

In discussions with FHWA, the only area where they are involved with driver training is with the longer combination vehicle (LCV) operators. They will initiate rule making proceedings and publish a final rule by December 1993 which establishes minimum training requirements for these vehicles. The FHWA has a requirement to report back to Congress as to the private sector's efforts to ensure adequate training for other entry-level drivers.

Safety - According to FHWA, CDL safety impact will not be able to be assessed until about five years or until sufficient data becomes available. However, they do believe that through the Commercial Driver's License Information System (CDLIS) and its association with the American Association of Motor Vehicle Administrators(AAMVA), the states, and the FHWA, that CDLIS will serve as a "pointer" to those drivers who should be taken off the road as unfit drivers. Therefore, as states issue CDLs, they electronically notify the system of the driver's history. This access will preserve the integrity of the single-license, single-record on each driver. All states are now on-line with this system.

In my discussions with ATA, one important safety improvement may be an off-shoot of this CDL process. For the last 5 years, the states and the FHWA conducted a nationwide (in 1992, Puerto Rico, 12 Canadian Provinces, and Mexico participated) roadside spotcheck of commercial motor vehicles that included trucks, buses, and their drivers on the road. During these 5 years, there has been over a 5 % reduction of vehicles and drivers taken off the road for serious violations. According to the FHWA statistics for the

Roadcheck '91, 46,000 vehicles were inspected with 13,000 vehicles and 2,500 drivers taken off the road. Preliminary data for Roadcheck 1992 shows even better results than 1991. Even with the '91 failure rate, it is still too high, but improvements are being made. Correlation to CDL - maybe?

DRIVING TRUCKS IN THE MILITARY

Unlike the American trucking industry, the military does not generate similar revenue from their nearly one million truck fleet. However, the magnitude of their overall responsibility is the same. The military is responsible for the oversight of thousands of often very young drivers who travel on the interstate throughout this nation and overseas. Like the commercial industry, the military fleet of trucks is comprised of a myriad of types, makes and sizes of vehicles. Most of these trucks are capable of transporting soldiers, petroleum, ammunition, nuclear warheads and even an occasional 120,000 pound tank.

Additionally, the DOD annually provides licenses to thousands of drivers for one or more of these transports. Imagine having to haul a 60 ton tank down the streets of Washington D.C. Furthermore, imagine yourself as a very young 18 year old, just out of high school, having to transport that same 60 ton tank down the congested streets of Frankfurt, Germany or an airman hauling a Ground Launched Cruise Missile (GLCM) on the back of a tractor-trailer rig. Unlike their civilian counterparts, soldiers, sailors, or airmen can be licensed at age 18, rather than the state regulated 21 years of age. The potential for disaster is great not only to the young soldier, airman, or seaman but to the poor soul who happens to encounter him/her on the highway. Due to the above concern, this paper will review the answers to the following questions:

- Does the young military driver have a license for that type of transport?

- How did he acquire the license?

- Was he provided quality training and by what standard?

In March 1988, DOD requested a waiver from the Department of Transportation (DoT) for military drivers from the provisions of the Commercial Motor Vehicle Safety Act of 1986 (Title XII, Public Law 99-750). This request was based upon the fact that military drivers are unique in that they drive and train primarily on military installations and overseas with equipment being specially designed for military related missions. Further, the licensing, suspension, and discipline system was such that it met or exceeded the requirements with the act. (16)

You would assume that the one organization that would implement driving standards would be the military. Isn't driving a wheel motor vehicle in the military as common as drill and ceremony or cleaning your rifle? That's what Department of Defense (DOD) thought when they granted the military services an exemption from the requirements of the law. Unfortunately, I believe there may be some similarities between Senator Danforth's reality and the realities in the military establishment. Do many of our service leaders look upon driving a truck in just that same manner?

The Army discovered problems - The Army maintains a fleet of over 360,000 authorized wheel vehicles. Of the 400,000 soldiers and civilians

needed to drive them , only 10 percent are trained at a Training and Doctrine Command (TRADOC) training base. The remainder are soldiers in all Military Occupational Specialties (MOS) who receive driver training as an adjunct to initial entry training or are civilians and soldiers trained in an installation or unit program.

No fewer than 19 separate Army publications discuss driver training, testing, and licensing at varying levels of detail. Moreover, the governing regulation , Army Regulation (AR) 600-55, Motor Vehicle Driver and Equipment Operator Selection, Training, Testing, and Licensing, has seen only one revision since January 1966 (the current version is dated October 1986).(3)

When you consider the magnitude of the Army's responsibility, it is not surprising that a few problems may arise in this process. In January 1989, LTG Samuel Wakefield, Chief of Transportation and Commandant of the Army's Transportation School, felt so strongly about this problem that he ordered a complete review of the Armywide driver training practices. This detailed review was to analyze, synthesize and evaluate driver training throughout the Army. Unfortunately, the answers that his staff discovered were no surprise to most that were in the Army's trucking business - they found:

- no single proponent for driver training;
- excessive, outdated driver safety and training regulations;
- questionable licensing practices;
- no standardized driver's training procedures.

Additionally, they discovered that the CDL driver licensing criteria approved by Congress was much more stringent than those currently used by the Army Transportation School for issuance of a military vehicle operator's permit. Existing Army regulations require military drivers to receive prescribed classroom instruction and pass a road test to qualify for an Army license (Army Form OF346). However, many soldiers in units have highly structured driver training programs while others are less intensive. In actuality, the prescribed classroom instruction would vary depending on the commander. Training could vary from one hour to eight weeks (Transportation Military Occupational Specialty Training). The road test on a particular truck could range from a lap around the motorpool to a verification of skills by a "check ride" with a qualified instructor. In some cases, "shotgun" miles were required prior to assigning the soldier a truck. (ADSO interview)

To rectify this disparity, the Army created the Armywide Driver Standardization Office (ADSO). Its basic purpose was to become the Army's single proponent for driver training and to develop standardized, exportable driver training and licensing packages for all branches of the Army. (ADSO interview) According to the U.S. Army, Chief of Transportation, the Army's goal is to ensure that Army drivers meet the same licensing standards as commercial drivers. (4)

The Army is now pursuing this theme so aggressively that they are presently working on a project to make the Army driver's license more credible and to assist drivers in getting a CDL. LTG Samuel Wakefield, believed the trucking industry and the Army can do something for each other. According to LTG Wakefield, the trucking industry needs proven talent behind the wheel; and the Army will have an easier recruiting job if

there is a demand for the soldier-driver's skills when he or she leaves the service.(6)

The Army is seeking approval for a CDL equivalent that would be accepted as a civilian commercial drivers license. The Army is hoping that the improvements they made in training and certification can be used to establish the military driver license as the legal equivalent of the CDL. This would allow soldiers departing the Army to compete immediately in the trucking workforce.

The Army's CDL equivalent - The Army's CDL equivalent consists of successfully passing two written tests for a Class B (straight truck) and three written tests for a Class A (tractor/truck with trailer). All drivers are required to successfully pass three performance (hands-on) tests. The tests consists of the following:

- General Knowledge Test (written),
 - Air Brake Test (written),
 - Combination Vehicle Test (written),
 - Pre-trip Inspection (hands-on),
 - Basic Control Skills (hands-on),
 - and a Road Test (hands-on).

A validation test was conducted by the Army at Fort Bragg on the above criteria. A representative from the FHWA conducted the external evaluation. The FHWA representative concluded that the Army's skill testing meets the standards currently required of the 50 states by the federal CDL standards. Approval may be held-up due to funding; however, this action is still being staffed and is expected to be approved. (ADSO interview)

How do the other services compare? - According to the Air Force Regulation on Operator Licensing, AFR 77-310, Vol 1, dated 29 May 1992, the commander is responsible for the conduct of his organization's vehicle operator licensing and training. In the case of large vehicles over 14,000 lbs, each organization is required to have a list of qualified persons as vehicle instructors. Each squadron commander must ensure that lesson plans are on file for the assigned vehicles. The unit may use, modify, or develop separate plans at the discretion of the unit commander.

After reviewing their basic regulation and interviewing several former squadron commanders, many similarities exist between the documented structure of the requirement, responsibility, and the conduct for operator training and licensing as was in the earlier Army driver training and licensing structure. Like the Army, decentralization of driver training and licensing is their method of operation. What standards exist in the area of driver knowledge, skills, and attitudes cannot be determined based on my review and discussions. Also, what qualifies the licensor is also not defined in the text.

According to my interview, it appears that the most experienced individual gets the duty of training the airman. How much is enough, what qualifies a driver, is the test hands-on or written, was not dictated by the text. Again, my interviews with the squadron commanders seemed to confirm my original assumptions. The specifics are primarily left up to each squadron commander and quality of training and execution of testing will vary. Likewise, the Navy and Marines have no centralized office that monitors, disseminates or sets driver training standards. No specific, common testing procedures could be found.

FRAMING THE SIMILARITIES BETWEEN INDUSTRY AND DEFENSE

I stated earlier that a few years ago, Congress, various government agencies and the trucking industry felt that improvements in highway safety were needed. They got together and asked "What needs to change?" The first and most important outcome was the development of the commercial driver's license. Commercial drivers are now tested according to a standard for the kind of vehicle they're going to operate. If it's a combination vehicle with air brakes, the driver will be tested on air brakes. If he/she is going to drive a POL tanker, he will be also tested on HAZMAT. Additionally, after testing, a system is in place to track each driver's record nationally and hold the driver accountable for not operating safely. Congress and industry felt that standardization was paramount.

I believe Cathy Sherman, a commercial truck driver and owner/operator, expressed the need for CDL even better, "Moving heavy equipment through lots of traffic, there is definitely a big economic reason to be safe. My truck costs \$145,000 and if I am not safe on the highway, I will have to pay for damage to my truck and any associated liability. Once you are behind the wheel you are accountable for your actions under CDL. Truck drivers have to be professionals - CDL forces these high standards upon us".

Most motor vehicles in the military, like the civilian trucks, are driven outside the truck transport arena; for example, dump trucks by engineers, fuel trucks by sailors, or missile transporters by airmen. Unlike your typical linehaul drivers in various transportation units in the Army or like Cathy Sherman, commercial carrier, their primary business is in transporting supplies locally, construction, repair, or other specialties. Therefore, the operation of their truck is only a small part of their overall responsibility.

This diversity of responsibilities within the services makes it as difficult to keep the individual or his unit commander informed on a regular basis about driving safety, regulations (i.e. HAZMAT) and on knowledge, skills, and attitudes as is the case in the commercial truck industry. Hence, driving inevitably becomes a secondary event. Unfortunately, all the same rules apply as if it were your primary mission. The law does not change. I believe by adopting the CDL process as did industry, the services will raise the threshold of their driver's accountability. I believe the loss of a CDL by a young airman or soldier will have a little more meaning than the temporary suspension of his/her military license.

Accountability was also the Army's original rationale in re-evaluating their own driver training program. The Army Driver Standardization Office at Fort Eustis indicated it was this concern over being accountable that led LTG Wakefield to become such a proponent for developing a concrete driver training, testing and licensing program. He felt the army had to have a quality, driver training program in order to meet the intent of the Federal waiver exempting the military from the CDL law. According to him, it will only take one accident between an Army POL tanker and a school bus to place the military in a very difficult position. Everything we do in the Army is based on task-condition-standard, driving should be no less. I firmly believe LTG Wakefield was on the mark. With over 95% of his truck drivers not school trained, he needed to place into the system an added incentive to upgrade the standards. Adopting CDL placed this requirement on the commander and most importantly on the individual soldier, a double-edge sword.

Unlike their civilian counterparts, the Army has aggressively taken its problem and solution beyond CDL to the next logical level - training. Not

only did they alter the testing process but realized that training also needed to address standardized skills and attitudes. In conjunction with a leading industrial expert in driver training, the ESSEX Corporation, the Army developed a quality driver training, testing and licensing program that focuses on basic skills, knowledge, and attitudes (SK&A) of personnel who drive large vehicles. They have established a solid foundation that parallels and even surpasses current federal and industry efforts by tying together training (SK&A) with their testing and licensing procedures. To ensure this program maintains its standards they have:

- Created a Driver Standardization Office that centrally controls and monitors all driver training within the Training and Doctrine Command (TRADOC).
- Developed exportable, standardized driver training packets for specific type trucks. Each packet includes training manual, vu-graphs, an operation and maintenance VHS tape, and a test booklet.
- Acquired state-of-the-art driver training simulators that will be placed at each of their regionalized driver training offices at major installations.
- Adopted the Army Commercial Drivers License (ACDL).

Through reducing duplication within the service, most of the above was done within the framework of an austere budget. According to the ADSO office, when a commander has a problem in training, testing, or licensing; they know where to call for resolution. In my conversation with members

from the ATA and FHWA. they believe the Army's driver training efforts are a model program and are definately on par with on-going civilian programs.

CONCLUSIONS

While each Service has its own rationale on why and how they are running their driver training, testing and licensing program, DOD must review in detail on how each program is being executed. As we become a more CONUS base force, as we reduce more and more stateside installations and as our missions become more humanitarian oriented, we may find ourselves more accountable to the community then in the past.

Accountability was recently questioned during my discussion with Air Force LTC Tom Smith. According to him, California and Nevada are already questioning several Air Force installations on why their drivers, who are regularly driving routine off-post commitments with tractor-trailers, do not have a CDL. When the Air Force responded that they were exempt, the states interpretation was that the law was for on-post exemptions only. The Air Force's reply was correct; however, when reviewing the waiver statement, its rationale was based on the uniqueness of military personnel driving and training on installations. Similar occurrences like the Air Force's have already been presented to the Army by their own installations.

Recommendations - I believe DOD should re-evaluate their original waiver request. In my review of the original DOD waiver request and its subsequent approval by DoT, several factors may have changed over time. DOD believed the waiver was justified, because the military limited their use to military installations rather than public highways. Secondly, their accident to mileage rate for CDL comparable trucks was half the civilian

counterpart. However, when you extrapolate comparable mileage, the military figure of accidents off-post only became 10% less. These assumptions and assessments were taken in 1987. With our drawdown, a CONUS based force coupled with added political support toward military disaster relief, accident exposure by our military may rise. Likewise, the potential for public pressure for military accountability upon civilian highways may also rise. It is logical that DOD should be on the leading edge of this potential problem, especially when CDL is nationwide and the public, unlike 1987, is aware of the law.

The Army's CDL initiative should be adopted and approved by the Department of Transportation. Secondly, CDL should be encouraged within the other services. Thirdly, because of our broader domestic responsibility, I would recommend that DoT coordinate with the states for a free CDL for all military personnel who qualify. During the aftermath of Hurricane "Andrew", soldiers were needed and requested by the state of Florida to operate school buses while regular drivers were recovering from their own personal crises. Buses fall under the provision of the CDL. I believe the bottom line is that this situation could easily become common place as the military assumes more of the domestic assistance functions - another very good reason why we must ensure all drivers are trained/licensed to the same standards as commercial operators. Not only will it raise the level of interest in driving for the service member, but it should add to the safety and our accountability toward the public.

The DOD should make every effort to publicize their CDL initiative to industry. Given the trucking industry's concern over shortages of licensed truckers, this concept could definitely be a blessing for Army recruitment, assisting soldiers in finding civilian employment and help to fill the critical

shortages within our trucking industry. An adjunct to this initiative is the building of a ready pool of truck drivers during mobilization. With the downsizing of active, Guard and Reserve personnel, the need for trained drivers could become critical in the future. There have been numerous examples in previous wars to include Desert Storm, of our military leaders being required to divert valuable combat power for truck power. During Desert Storm both the Army and the Air Force experienced such a diversion of valuable resources. The Army was required to divert an entire combat brigade, while the Air Force transitioned scores of aircraft mechanics, cooks and administrative personnel in order to meet their truck requirements. We can minimize this type of diversion during mobilization if we were to take advantage of the statewide CDL information system. This automated information system can provide us with a detailed database on all qualified truck drivers throughout the country. Both DoT and DoD should further review the potential of using such a system during a national crises.

Should the Services adopt CDL? - I believe the diversity within the services makes the answer to this question problematical. Is anything worth doing - doing right? Then I believe the Army's approach is right-on. This subject is highly arguable, because regardless of your defense, that "anyone who can scramble eggs can drive a truck" attitude will still be there. I do believe it is logical that some common skills, knowledge and attitude type questions should be on all driving exams and should be known by all drivers. Studies by ESSEX have shown this to be categorically the case. Is this done by all the services? This was extremely difficult to place a finger on, since every commander I talked to had differing opinions as to his or her

testing and licensing procedure. Almost all believed their program to be thorough; but when asked to explain, few details existed.

Unfortunately, I believe my "scramble eggs" syndrome is alive and well. I know it still exists in the Army. During these days of dwindling funds, retaining quality training is and will continue to be our greatest challenge. We need to take advantage of the services that each of our states are providing and have our drivers throughout DoD acquire a standardized CDL from where he/she is presently assigned. With a CONUS based military, with continuing reduction of forces, and the continued need for drivers during mobilization, what better way to level the playing field by having everyone with the same license. The usefulness of this action will not only payoff during a time of peace but also war, providing us with a ready pool of drivers. This concept is worth pursuing by not only the active components but also the reserve and national guard.

SELECTED BIBLIOGRAPHY

1. Transport Topics. "National Newspaper of the Trucking Industry", May 6, 1991, pp. 1, 8, 9.
2. Defense Transportation Journal. "Uncle Sam Wants His Truck Drivers To Work for You", October, 1991, p. 70.
3. U.S. Army Transportation Corps Journal. "Standardizing Driver Training in the U.S. Army", January 1990, pp. 28-30.
4. U.S. Army Transportation Corps Journal. "A Driving Career After the Army", October, 1990, pp. 20, 25.
5. U.S. Army Transportation Corps Journal. "CDL Provides Opportunities for Drivers", October 1991, p.25.
6. Industry Watch. "Army wants to issue CDL licenses", March 1992, p. 8.
7. Department of Transportation. Motor Carrier Activities of the Federal Highway Administration. Washington, D.C.: Government Printing Office. May 1992.
8. Interview with Samuel Rea, Federal Highway Administration, Safety Analyst on the Federal Commercial Drivers Licensing(CDL) Program, October 1992.
9. Interview with Robert Redmond, U.S. Department of Transportation, Senior Transportation Specialist on CDL and its impact on the North American Free Trade Agreement (NAFTA), November 1992.
10. Interview with Dr. William Rogers, American Trucking Association(ATA), Safety Analyst on the ATA's position on CDL, November & December 1992.
11. U.S. Industrial Outlook. "Transportation Service", 1992, pp. 40-8, 4-9.
12. Remarks during the Fourth North American Road Transportation Conference, by Thomas J. Donohue, President & CEO, American Trucking Association, September 1992.

13. Hearings before the Subcommittee on Surface Transportation of the Committee on Commerce, Science, and Transportation U.S. Senate. First Session on Motor Carrier Safety. April 18-19, 1989. Washington D.C.: Government Printing Office. 1989.
14. Title XII, Public Law 99-570. Commercial Motor Vehicle Safety Act of 1986. Washington D.C.: Government Printing Office. 1986
15. Federal Register, Vol. 53, No. 72. Proposed Rules for Commercial Driver's License Program: Waivers: Request for Comments: Notice of Petition. April 14, 1988. pp. 12504-12507.
16. Federal Register, Vol. 53, No. 186. Rules and Regulations for the Commercial Driver's License: Waiver. September 26, 1988, pp. 37231-37538.
17. Federal Register, Vol. 54, No. 19. Proposed Rules For Commercial Driver's License: Disqualifications. January 31, 1989, pp. 5036-5049.
18. Federal Register, Vol. 54, No. 190. Rules and Regulations for the Commercial Driver's License: Disqualifications. October 3, 1989, pp. 40782-40787.
19. Office of Motor Carrier Standards Division (HCS-20). Commercial Driver's License Standards: Requirements and Penalties (49 CFR Part 383). Department of Transportation, Federal Highway Administration, June 22, 1990.
20. Office of Motor Carrier Standards Division (HCS-20). Commercial Driver's License Standards: Requirements and Penalties (Interpretations of 49 CFR Part 383). Department of Transportation, Federal Highway Administration, February 8, 1991.
21. U.S. Air Force Regulation, AFR 77-310 (Vol 1). Operator Records and Licensing. May 29, 1992, pp. 26-32.
22. Interview with Chief Master Sergeant Hodson, U.S. Air Force, Vehicle Division, Department of the Air Force on Driver Training in the Air Force, Nov & Dec 1992.